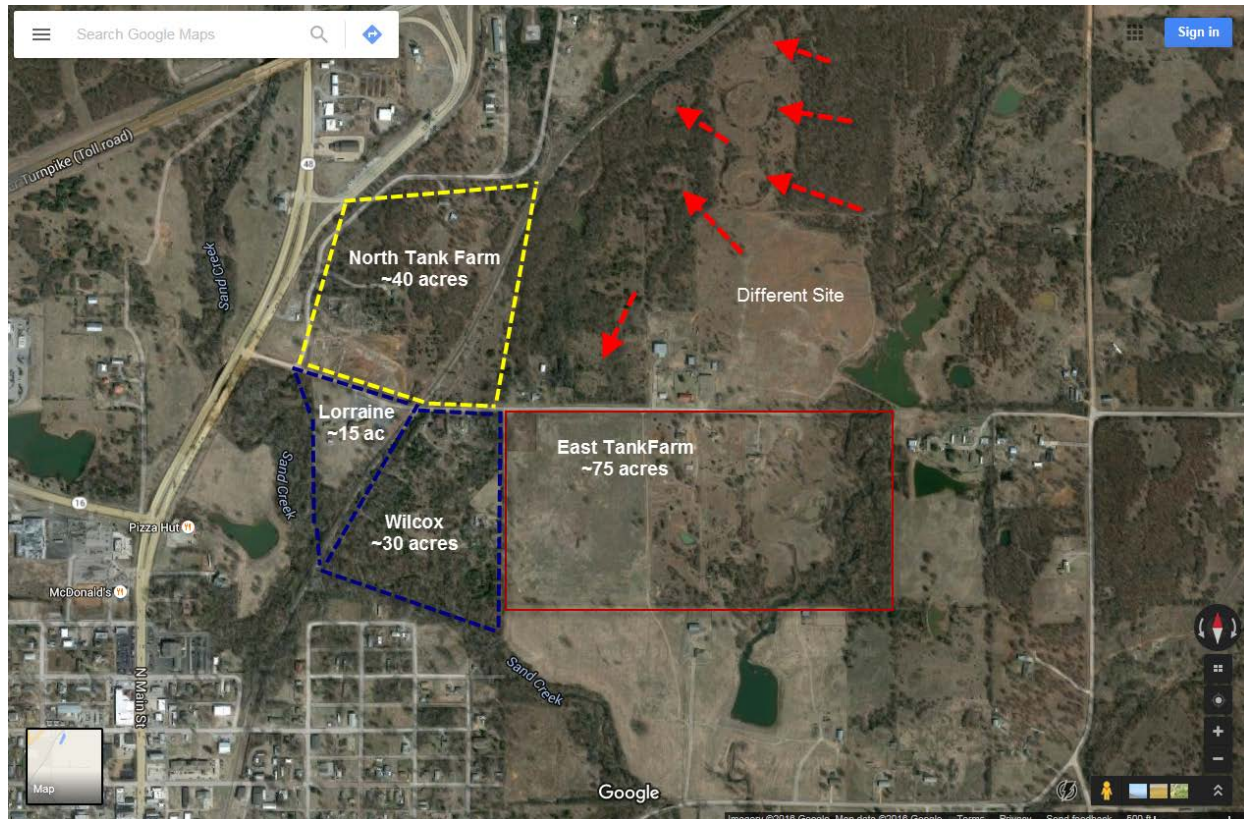


From: Eady, Thomas
 To: Coltrane, Kalina; hsega_east.com; Turner, Philig; Tori McMillan (tmcmillan@east.com); Kapuscinski, Rich; Barry Forsythe; Sprenger, Mark; Jefferson, Matthew; Amy Brittain@deg.ok.gov; jsnyder@east.com; Suzanne Dunn; jonathan.d.mcburney@imco.com; crady@east.com; Crumling, Deana; Todd Downham; Thomas, Duane
 Subject: RE: Wilcox RI Planning Discussion
 Date: Tuesday, February 16, 2016 1:54:36 PM
 Attachments: image001.png

Food for thought for the ERT discussion regarding the CSM and RI Scoping



Hypothetical Question – If we had only 2 years and \$10 million to deal with site, how would we adjust our approach to accomplish our remedial objectives?

Some thoughts:

East Tank Farm and North Tank Farm

-

2-year objective: Remediate and return to residents without restrictions. Delist this parcel from the NPL

Preliminary CSM/Data Gaps:

1. Contamination limited (it appears)
 - a. mostly crude oil residuals in limited spots
 - b. several former oil/water separation ponds with limited contamination
 - c. "waste material" used for road/pad base material and for berm fortification
2. Site underlain with shallow bedrock and/or shallow clay layer – deep contamination unlikely, but unknown.
3. Subsurface migration (PHCs/groundwater) – not likely a significant issue, but unknown.
4. Surface migration does not appear to be an issue
5. Vapor intrusion not likely, but not known

Year 1 actions:

1. Mow field
2. Identify and measure/sample surficial waste areas for disposal purposes
3. Confirm vapor intrusion is not an issue
4. Delineate subsurface extent of waste areas for disposal purposes (volume, disposal options, costs)
5. Incremental composite sampling of all "non-waste" areas for both risk assessment purposes
6. Perform eco risk assessment (small mammal) to inform decision as to whether crops/grazing is safe
7. Drill monitoring wells at select locations to determine if groundwater to surface water migration is occurring

Year 2 actions:

1. Mow field
2. Dig and haul surface and subsurface wastes
 - a. Off-site disposal likely option (subtitle C or D?)
 - b. Land farming on Wilcox an option to consider, but not likely
3. Install permeable reaction barriers if/where contaminated groundwater to surface water migration exists
4. Perform incremental composite sampling again to verify acceptable risk
5. Begin partial delisting process
6. Turn over to residents (with ICs if needed)

Wilcox and Lorraine

-

2-year objective:

- Eliminate surface erosion of contaminants to Sand Creek in Year 1
 - Excavate, stabilize and dispose high-metals soils at an appropriate off-site facility (Removal Action)

- Eliminate subsurface migration of contaminants to Sand Creek in Year 2
- Eliminate VI issues (if present) in White home in Year 1
- Eliminate surface exposures in both Year 1 & 2
- Ship highly contaminated soils for off-site disposal
- Leave residual contamination in place with appropriate institutional controls
 - Ideally with passive/active remediation in place
 - In-situ bio
 - Land farming
 - Phytoremediation
 - Permeable barriers
- Look for industrial property buyers to complete remediation as part of a purchase deal (treat as Brownfields properties)

Year 1 actions: (Group discussion)

Year 2 actions: (Group discussion)

Sand Creek – Evaluate Sand Creek impact and required actions AFTER completing the above actions, since migration will have ceased by that time.

Tom Kady
USEPA Environmental Response Team
732-735-5822

From: Coltrain, Katrina

Sent: Tuesday, February 16, 2016 11:46 AM

To: Kady, Thomas <Kady.Thomas@epa.gov>; lvega_eaest.com <lvega@eaest.com>; Turner, Philip <Turner.Philip@epa.gov>; Teri Mcmillan (tmcmillan@eaest.com) <tmcmillan@eaest.com>; Kapuscinski, Rich <Kapuscinski.Rich@epa.gov>; Barry Forsythe <barry_forsythe@fws.gov>; Sprenger, Mark <Sprenger.Mark@epa.gov>; Jefferson, Matthew <jefferson.matthew@epa.gov>; Amy.Brittain@deq.ok.gov; jsnyder@eaest.com; Suzanne Dunn <suzanne_dunn@fws.gov>; jonathan.d.mcburney@lmco.com; cradu@eaest.com; Crumbling, Deana <Crumbling.Deana@epa.gov>; Todd Downham <todd.downham@deq.ok.gov>; Thomas, Duane <djthomas@eaest.com>

Subject: Wilcox RI Planning Discussion

All, there are updated figures and 4DIM files on the website for you to download.

Katrina Higgins-Coltrain
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